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20 UNITED STATES DISTRICT COURT  
21 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF  
24 GOVERNMENT EMPLOYEES, AFL-CIO;  
25 AMERICAN FEDERATION OF STATE  
26 COUNTY AND MUNICIPAL EMPLOYEES,  
27 AFL-CIO; et al.,

28 Plaintiffs,

v.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Case No. 3:25-cv-01780-WHA

**DECLARATION OF ERIK  
MOLVAR**

**DECLARATION OF ERIK MOLVAR**

Erik Molvar hereby declares:

1. I am the Executive Director of the Western Watersheds Project. I am a wildlife biologist with published research in the behavior, ecology, and population dynamics of Alaskan moose as well as large-scale conservation planning. I am also the author of 16 hiking guidebooks and backpacking techniques manuals for national parks and wilderness areas spanning the West from Alaska to Arizona. I am also a member of Western Watersheds Project and have been a member since 2016.

2. I am a former federal employee. I was employed by the U.S. Forest Service on a stream survey crew in the Clearwater National Forest in 1987 to survey habitat for salmon and steelhead. From 1989 to 1998, I was employed seasonally as a biological technician on Operation Fish Run for the U.S. Army Corps of Engineers barging juvenile salmon and steelhead down the Snake and Columbia Rivers.

3. Western Watersheds Project is a non-profit environmental conservation group that works to influence and improve public lands management throughout the western United States in order to protect native species and conserve and restore the habitats they depend on. Our primary focus is on the negative impacts of livestock grazing, including harm to ecological, biological, cultural, historic, archeological, scenic resources, wilderness values, roadless areas, Wilderness Study Areas and designated Wilderness.

4. Western Watersheds Project was founded in 1993 and has over 14,000 members and supporters. We cover 250 million acres of public land spanning all of the western states and we have field offices in Idaho, Montana, Wyoming, Arizona, Nevada, and Oregon.

5. I am aware of the media reports that the federal government is engaged in a mass termination of thousands of employees with probationary status, including employees of the Forest Service, Bureau of Land Management, National Parks System, and National Science Foundation.

6. This mass termination of employees will have an immediate adverse effect on the ability of the Western Watersheds Project to accomplish its mission.

7. For example, I was told by a federal employee on February 20, 2025 that because of

1 staffing issues the Bureau of Land Management is unable to respond to a Freedom of Information Act  
2 request submitted by the Western Watersheds Project. Our work depends on timely access to public  
3 records.

4 8. I am aware that range management and biologist positions have been terminated  
5 within the Bureau of Land Management. The Bureau is responsible for conducting land health  
6 assessments to monitor the impact of cattle and sheep grazing on public lands. When land health  
7 assessments reveal failures to meet land health standards, the Bureau must take immediate action  
8 before the next grazing season in accordance with federal regulations. Even at full staffing, the  
9 Bureau was having severe difficulties in conducting land health assessments in all of the lands that  
10 are leased to commercial livestock operations today. The loss of federal employees in range and  
11 biological positions will result in an increase in the failure to conduct land health assessments and,  
12 therefore, the failure to correct ecologically destructive livestock grazing on federal public lands.  
13 This will impair Western Watershed Project's mission.

14 9. The National Park Service is directed to protect and preserve crown jewel public lands  
15 for the use and enjoyment of the general public. This is an agency that already is understaffed and, in  
16 the past, inadequate levels of staffing at the National Park Service have impaired its operations. I am  
17 aware, for example, of the poaching of elk in Zion National Park due primarily to the lack of federal  
18 employees. This directly harms the Western Watersheds Project's mission to protect and restore  
19 native wildlife.

20 10. The U.S. Forest Service is charged with managing commercial livestock grazing that  
21 is permitted across tens of millions of acres of national forest lands. Even at full staffing levels, the  
22 agency has been unable to prevent livestock grazing that has caused chronic and serious degradation  
23 of streamside habitats of rare and imperiled fish species ranging from the arctic grayling to chinook  
24 salmon to steelhead and bull trout. The loss of federal employees engaged in the oversight of  
25 livestock grazing will inevitably result in increased livestock damage to riparian habitats and

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1 spawning streams critical to the survival of these sensitive species. That will harm the Western  
2 Watershed Project's mission.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
4 and correct. Executed this 21<sup>st</sup> day of February 2025.

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6   
7 Erik Molvar